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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO UBER'S MOTION TO COMPEL  
INTERROGATORIES**

14 vs.

15 UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
16 LLC,

17 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal confidential information in its Opposition to Uber’s Motion to Compel Interrogatories  
 8 (“Waymo’s Administrative Motion”). Waymo’s Administrative Motion seeks an order sealing the  
 9 following materials:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Waymo’s Opposition to Uber’s Motion to Compel Interrogatories (“Waymo’s Motion”)	Highlighted in Blue	Defendants
Exhibit 1 to Waymo’s Motion	Entire Document	Lior Ron
Exhibit 2 to Waymo’s Motion	Entire Document	Defendants
Exhibit 3 to Waymo’s Motion	Highlighted in Blue	Defendants

15       3. Waymo’s Motion and exhibits contain information that Defendants and/or Mr. Ron  
 16 have designated as confidential and/or highly confidential.

17       4. Waymo takes no position on the merits of sealing Defendants’ designated material, and  
 18 expects Defendants and Mr. Ron to file one or more declarations in accordance with the Local Rules.

19       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
 20 true and correct, and that this declaration was executed in San Francisco, California, on August 9,  
 21 2017.

22       By /s/ Lindsay Cooper

23                   Lindsay Cooper  
 24                   Attorneys for WAYMO LLC

1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Lindsay Cooper.

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5                   */s/ Charles K. Verhoeven*  
6                   Charles K. Verhoeven  
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